

New York Association of Public Power

The New York Association of Public Power (NYAPP) is composed of 9 municipal electric utilities and 4 rural electric cooperatives. These public power entities are not-for-profit and are owned by their consumers. NYAPP's members provide power that is low-cost, based on renewable resources, and provided with a concern for energy efficiency and economic development. NYAPP's comment is that the 2009 Energy Plan should be focused on the impact of competition on consumers and the state of restructuring in the electric industry. The 1994, 1998 and 2002 Energy Plans all addressed competition. The draft scope of the 2009 Energy Plan does not address competition, and does not mention the role of the New York Independent System Operator (NYISO), which administers the organized markets in NY. NYAPP respectfully requests that the Energy Planning Board critically examine the state of restructuring in New York and the role of the NYISO in the 2009 Energy Plan. The 2002 Energy Plan predicted lower rates in 2008. Instead, costs to consumers have increased. In 1997, average customer rates in NY were 11.1 cents/KWh. In 2007 average customer rates were 15.4 cents, an increase of 4.3 cents. Nationwide, the average price increase was 2.3 cents. (Based on EIA data.) While fossil fuel prices have risen dramatically, studies show that states with organized markets have had electricity prices increase at twice the rate of states that do not. Clearly, New York is falling behind, not catching up.